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6 Attorney for Carla Peterson
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 Carla Peterson,
14 A.K.A. Regina Ann King.

15 Defendant.
16

Case No. 2:19-cr-119-APG-GWF

STIPULATION TO MODIFY A
CONDITION OF PRETRIAL
RELEASE

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich,
18 United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley,
20 Assistant Federal Public Defender, counsel for Carla Peterson, to modify a condition of pre-trial
21 release.
22

23 This Stipulation is entered into for the following reasons:

24 1. Ms. Peterson was placed on Pretrial Supervision on June 3, 2019. One of the
25 conditions of her pretrial release was that Ms. Peterson's travel was restricted to the Central District
26 of California (where Ms. Peterson resides) and the District of Nevada, for Court.

27 2. Ms. Peterson has been offered employment with Leap Pal Parts and Consumables.

1 Leap Pal Parts and Consumables is located in Raleigh, North Carolina.

2 3. Ms. Peterson has an employment meetings scheduled with Leap Pal Parts and
3 Consumables from July 5 2019 through July 12, 2019.

4 4. Ms. Peterson requests that she be allowed to travel, for employment purposes to
5 Raleigh, North Carolina from July 5, 2019 through July 12, 2019.

6 5. Ms. Peterson must provide Pretrial Services, before leaving the Central District of
7 California, with her travel itinerary to and from Raleigh, North Carolina.

8 6. Ms. Peterson must provide Pretrial Services with the Raleigh, North Carolina
9 address and phone number of where she will be staying.

10 7. Ms. Peterson has been in full compliance with her other terms of supervision

11 8. The Pretrial Service Officer does not oppose the modification of Ms. Peterson's
12 travel restrictions to allow her to travel to North Carolina for employment related purposes.

13 9. The United States Attorney does not oppose modifying Ms. Peterson's travel
14 restrictions to allow her to travel to North Carolina for employment-related purposes.

15
16 DATED this 25th day of June, 2019.

17
18 RENE L. VALLADARES
19 Federal Public Defender

20 /s/ Monique Kirtley

21 By _____
22 MONIQUE KIRTLEY
Assistant Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Kimberly M. Frayn

By _____
KIMBERLY M. FRAYN
Assistant United States Attorney

23 IT IS SO ORDERED.

24
25 DATED this 27 day of June, 2019.

26
27 
UNITED STATES MAGISTRATE JUDGE